

EXHIBIT 37

CONFIDENTIAL - ATTORNEYS' EYES ONLY

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GOVERNMENT OF THE UNITED
STATES VIRGIN ISLANDS,

Plaintiff,

vs.

Case No.

1:22-cv-10904-JSR

JPMORGAN CHASE BANK, N.A.,

Defendant.

JPMORGAN CHASE BANK, N.A.,

Third-Party
Plaintiff,

vs.

JAMES EDWARD STALEY,

Third-Party
Defendant.

Wednesday, April 19, 2023

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Videotaped deposition of Phillip DeLuca, held
at the offices of Ulmer & Berne, 65 East State Street,
Columbus, Ohio, commencing at 9:06 a.m., on the above
date, before Carol A. Kirk, Registered Merit Reporter,
Certified Shorthand Reporter, and Notary Public.

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1 I -- I think I read somewhere that they were
2 interested in him.

3 Q. So why would that make you call?

4 A. I had a -- I spoke with the FBI
5 daily.

6 Q. Was it to exchange information
7 with the FBI about Mr. Epstein?

8 MR. KRAUSE: Objection.

9 A. My conversations?

10 Q. The purpose of your call.

11 A. The purpose of my call was
12 specifically to exchange information.

13 Q. About Mr. Epstein?

14 A. To gather information on what
15 their investigation was.

16 Q. Did you ever provide information
17 to the FBI about Mr. Epstein?

18 A. Like? Not that I recall.

19 Q. Did you ever speak with an FBI
20 agent about Mr. Epstein?

21 A. An agent?

22 Q. Anybody at the FBI.

23 A. Oh, yes, I did.

24 Q. Okay. Who did you speak with at

1 the FBI?

2 A. His name is Tim Moyer.

3 Q. Okay. And what did you tell

4 Mr. Moyer in your call?

5 A. I asked Mr. Moyer to provide me

6 with the contact in the FBI who may have been

7 working the Epstein matter.

8 Q. Did he confirm that the FBI -- did

9 Mr. Moyer confirm that the FBI was looking at

10 Epstein?

11 A. He indicated to me, "Let me get

12 back to you."

13 Q. About whether the FBI was looking

14 at Mr. Epstein?

15 MR. KRAUSE: Objection.

16 A. I -- that's what I took it to

17 mean.

18 Q. Did you share any information

19 about Mr. Epstein with Mr. Moyer when you spoke

20 with him?

21 A. Not that I recall.

22 Q. Did you send him any information

23 about Mr. Epstein?

24 A. Not that I recall.

1 Lenny Gail. I represent JPMorgan. A few
2 clarifying questions, and we'll get you out of
3 here.

4 A. Okay.

5 Q. You testified about a call you
6 made to the FBI earlier today.

7 Do you recall that?

8 A. I do.

9 Q. Before you made that call, had you
10 seen news stories relating to Jeffrey Epstein?

11 A. I think so.

12 Q. Remind us again the name of the
13 person you contacted.

14 A. His name was Tim Moyer.

15 Q. Why did you reach out to Mr. Moyer
16 at that time about Epstein?

17 A. I met with the FBI on a monthly
18 basis at that point in time, and I recall
19 reading somewhere that the FBI was -- initiated
20 an investigation, and I was looking for the
21 contact that I could talk to.

22 Q. What did you ask Mr. Moyer?

23 A. I asked Tim for a contact that
24 I could talk to.

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1 Q. What did he say in response?

2 A. "I'll get back to you."

3 Q. Do you recall anything else?

4 A. Pardon?

5 Q. Do you recall anything else about
6 the call?

7 A. No.

8 Q. How was it left?

9 A. That he would get back to me.

10 Q. So did you ever hear back from
11 Mr. Moyer?

12 A. About that? No.

13 Q. Did you ever hear back from anyone
14 else at the FBI, whether an investigator, an
15 agent, or otherwise?

16 A. No.

17 Q. Given your consistent dealings
18 with law enforcement, how did you interpret the
19 fact that the FBI never got back to you about
20 Epstein?

21 A. That they weren't interested.

22 Q. Okay. One more topic, and then
23 we'll be done.

24